

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
CONSOLIDATED ENVIRONMENTAL MANAGEMENT, INC. - NUCOR STEEL LOUISIANA

**PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT
 ON PROPOSED INITIAL PART 70 AIR OPERATING PERMIT AND PREVENTION OF
 SIGNIFICANT DETERIORATION PERMIT
 & THE ASSOCIATED ENVIRONMENTAL ASSESSMENT STATEMENT**

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on an initial Part 70 Air Operating Permit and Prevention of Significant Deterioration (PSD) Permit and the associated Environmental Assessment Statement (EAS) for Consolidated Environmental Management, Inc, 1915 Rexford Road, Charlotte, NC 28211 for the Nucor Steel Louisiana facility. The facility is located on the south side of LA Highway 3125 and east of LA Highway 70 near Convent, Louisiana. This location reflects the portion of the property surrounding the proposed facility that will be fenced. Some of the property is located north of LA Highway 3125, but that portion of the property will not house any equipment. The mailing address of the facility's location is Convent, but the facility will be located at about mile marker +163 just upstream of the community of Romeville in St. James Parish.

The hearing will be held on Thursday, April 15, 2010, beginning at 6:00 p.m., at the St. James Parish Courthouse, Courtroom A, 5800 LA Highway 44, Convent, LA. During the hearing, all interested persons will have an opportunity to comment on the proposed permit.

Consolidated Environmental Management, Inc. requested an initial Part 70 Air Operating Permit and a Prevention of Significant Deterioration (PSD) Permit for a greenfield pig iron facility. The Nucor Steel Louisiana facility will use the blast furnace process to produce high quality pig iron. Nucor plans for the mill to reach an anticipated peak annual production rate of over six million metric tonnes of iron per year. The basic raw materials for the pig iron production process are iron ore, in lump or pellet form; coal; sinter; and flux, which may be limestone, dolomite, or slag. The facility will process the coal into metallurgical-grade coke for use in the blast furnaces at dedicated coke ovens on the site. The blast furnaces themselves are closed units with virtually no atmospheric emissions. The coke ovens follow the heat recovery design. A sinter plant will also be constructed at the site to recycle fine materials and dusts for increased raw material efficiency. By recovering heat from the coking process and combusting blast furnace gas in multiple boilers, the mill will produce enough electricity to completely provide for facility usage and may also provide some electrical export to the public utility grid.

The proposed permits were previously public noticed on October 15, 2008, and a public hearing was conducted on November 20, 2008. Several comments were received and incorporated into this revised proposed permit. A revised air quality analysis was performed and is included in this revised proposed permit.

This permit was processed as an expedited permit in accordance with LAC 33:I.Chapter 18.

Estimated emissions in tons per year are as follows:

Pollutant	Emissions in tons per year
PM ₁₀	696.60
SO ₂	3,781.87
NO _x	3,791.83

<u>Pollutant</u>	<u>Emissions in tons per year</u>
CO	29,394.48
VOC	401.97
Lead	0.375
Toxic VOC included in Totals*	82.29
Toxic Non-VOC compounds*	24.62

*LAC 33:III.Chapter 51-regulated toxic air pollutants (TAP) for which facility-wide emissions exceed the pollutant-specific Minimum Emission Rate (MER) listed in LAC 33:III.Chapter 51.Tables 51.1 and 51.2: ammonia – 20.68 tpy, arsenic and compounds – 0.100 tpy, cadmium and compounds – 0.10 tpy, copper and compounds – 0.208 tpy, mercury and compounds – 0.289 tpy, zinc and compounds – 2.35 tpy, acrolein – 0.18 tpy, acrylonitrile – 0.79 tpy, benzene – 56.05 tpy, hydrofluoric acid – 0.08 tpy, methylene chloride – 1.35 tpy, polynuclear aromatic hydrocarbons – 5.21 tpy, phenol – 11.73 tpy

Neither the project nor the general commercial, residential, industrial, or other growth associated with it is expected to have a significant adverse impact on soil, vegetation, visibility, or air quality in the area of the facility or any Class I area. Because the maximum modeled PM/PM₁₀, SO₂, and NO_x impacts exceeded its/their respective modeling significance levels, a determination of increment consumption was required, and the results are summarized in the following table. Modeling demonstrates compliance with the allowable Class I and II PSD increments.

Dispersion Model(s) Used: CALPUFF (Class I)

Pollutant	Averaging Period	Allowed Class I PSD Increment	Modeled Class I Increment* (All modeled facilities)	Allowed Level of Significant Impact	NUCOR contribution to Increment
PM ₁₀	24 - hour	8 µg/m ³	0.18 µg/m ³		
SO ₂	3 -hour	25 µg/m ³	62.9 µg/m ³	1.0 µg/m ³	< 1.0 µg/m ³
SO ₂	24 - hour	5 µg/m ³	31.9 µg/m ³	0.2 µg/m ³	< 0.2 µg/m ³
SO ₂	Annual	2 µg/m ³	0.010 µg/m ³		
NO _x	Annual	2.5 µg/m ³	0.0069 µg/m ³		

* When the modeled value from all surrounding facilities and Nucor's contribution exceed the allowed Class I PSD Increment, then EPA allows Nucor's contribution to be compared to the allowed Level of Significant Impact. At locations where Nucor's contribution was deemed significant, the model determined that the contribution from Nucor and all surrounding facilities did not exceed the allowed Class I PSD Increment.

Dispersion Model(s) Used: AERMOD (Class II)

Pollutant	Averaging Period	Class II PSD Increment	Modeled Class II Increment** (All modeled facilities)	Allowed Level of Significant Impact	NUCOR contribution to Increment
PM ₁₀	24 - hour	30 µg/m ³	Exceeded	5 µg/m ³	3.22 µg/m ³

Pollutant	Averaging Period	Class II PSD Increment	Modeled Class II Increment** (All modeled facilities)	Allowed Level of Significant Impact	NUCOR contribution to Increment
SO ₂	3 -hour	512 µg/m ³	Exceeded	25 µg/m ³	17.28 µg/m ³
SO ₂	24 - hour	91 µg/m ³	Exceeded	5 µg/m ³	3.73 µg/m ³
SO ₂	Annual	20 µg/m ³	Exceeded	1 µg/m ³	0.24 µg/m ³
NO _x	Annual	25 µg/m ³	7.43 µg/m ³		

Dispersion Model(s) Used: AERMOD (Class II)

Pollutant	Averaging Period	Class II PSD Increment	Modeled Class II Increment***
PM ₁₀	24 - hour	30 µg/m ³	28.06 µg/m ³
SO ₂	3 -hour	512 µg/m ³	94.18 µg/m ³
SO ₂	24 - hour	91 µg/m ³	38.68 µg/m ³
SO ₂	Annual	20 µg/m ³	8.39 µg/m ³

** When the modeled value from all surrounding facilities and Nucor's contribution exceed the allowed Class II PSD Increment, then EPA allows Nucor's contribution to be compared to the Allowed Level of Significant Impact. Where Nucor's contribution was deemed significant and the receptor was located on other industrial property, the emissions for the facility to which the property belongs were removed from the model. The model was then rerun to determine if any exceedances of the NAAQS or PSD increment occurred. If Nucor's contribution was deemed significant and the receptor was not located on other industrial property, Nucor analyzed whether it had an impact above the significance level at the receptor of concern at the time during which the receptor exceeded the respective standards.

*** These values represent Nucor's sources only; these values include receptors at which an exceedance did not occur and for which it was not necessary to compare Nucor's contribution to the significance level. For short term standards, this number is represented by the highest second high value; this number is used for comparison purposes only.

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

All interested persons will be afforded the opportunity to comment on the proposed proposed initial Part 70 Air Operating and Prevention of Significant Deterioration permits and the EAS.

The EAS submitted by the applicant addresses avoidance of potential and real environmental effects, balancing of social and economic benefits against environmental impact costs, and alternative sites, projects, and mitigative measures.

Written comments or written requests for notification of the final permit decision regarding this permit action may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton form_7117_r01
04/30/07

Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., Monday, April 19, 2010.** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The proposed initial Part 70 Air Operating and Prevention of Significant Deterioration permits, permit application, Statement of Basis, Environmental Assessment Statement (response to "IT" Questions), and additional information submittals are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at St. James Public Library, 1879 West Main Street, Lutcher, LA .

Previous notices have been published in The Advocate, Baton Rouge, and in the The Enterprise, Vacherie, on October 15, 2008; and in the The News Examiner, Convent, on October 16, 2008

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact Heather Manry at the above address or by phone at (225) 219-3279.

Inquiries or requests for additional information regarding this permit action should be directed to Kermit Wittenburg, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3008.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at <http://www.deq.louisiana.gov/apps/pubNotice/default.asp> and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/ocs/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 157847, Permit Number 2560-00281-V0 and PSD-LA-740, and Activity Number PER20080001 and PER20080002, respectively

Scheduled for publication: Wednesday, March 10, 2010 in The Enterprise & The Advocate
Thursday, March 11, 2010 in The News-Examiner

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Mr. Joe Rutkowski
Vice President
1915 Rexford Rd
Charlotte, NC 28211

RE: Part 70 Operating Permit, Nucor Steel Louisiana
Consolidated Environmental Management Inc, Convent, St. James Parish, Louisiana

Dear Mr. Rutkowski:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2010.

Permit No.: 2560-00281-V0

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:kew
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Consolidated Environmental Management Inc - Nucor Steel Louisiana

Agency Interest No.: 157847

Consolidated Environmental Management Inc

Convent, St. James Parish, Louisiana

I. Background

Consolidated Environmental Management Inc - Nucor Steel Louisiana (Nucor) is a proposed new Pig Iron manufacturing facility which is expected to begin operation in 2011.

This is the initial Part 70 operating permit for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Consolidated Environmental Management Inc on May 12, 2008, requesting a Part 70 operating permit. Additional information dated August 6, 2008, August 7, 2008, August 8, 2008, August 11, 2008, August 12, 2008, August 13, 2008, August 25, 2008, August 26, 2008, September 24, 2008, October 1, 2008, January 6, 2009, and February 18, 2009 were also received. This permit is based on a complete resubmittal of the modeling protocol dated March 12, 2009 and a complete resubmittal of the application dated June 26, 2009.

III. Description

The Nucor Steel Louisiana facility will use the blast furnace process to produce high quality pig iron. Nucor plans for the mill to reach an anticipated peak annual production rate of six million metric tonnes of iron. The basic raw materials for the pig iron production process are iron ore, in lump or pellet form; coal; sinter; and flux, which may be limestone, dolomite, or electric arc furnace slag. The facility will process the coal into metallurgical-grade coke for use in the blast furnaces at dedicated coke ovens on the site. The blast furnaces themselves are closed units with virtually no atmospheric emissions. The coke ovens follow the heat recovery design. A sinter plant will also be constructed at the site to recycle fine materials and dusts for increased raw material efficiency. By recovering heat from the coking process and combusting blast furnace gas in multiple boilers, the mill will produce enough electricity to completely provide for facility usage and also provide some electrical export to the public utility grid.

The basic raw materials of the blast furnace process will be received by ship, barge, and rail, with additional supplies and materials being delivered by truck. Pig iron produced at the facility will be stored on-site in outdoor storage piles. The iron will be loaded onto trucks or rail cars and transported to the Mississippi River dock for shipment to customers by ship or barge. Coke fines from the coke handling areas will ship to customers, primarily by barge. Granulated slag and slag aggregate from the slag granulation area are planned to be shipped to customers by barge or rail. Pulverized slag from the slag granulation/milling area will be shipped to customers, primarily by truck. Flue Das Desulfurization (FGD) dust from the coke plant and the sinter plant will be shipped to a landfill, primarily by truck. Additional products and materials may be shipped by other means as conditions warrant.

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In the coke production process, coal is subjected to high heat in a battery of ovens, with the object of thermally cracking the organic compounds in the coal, leaving only pure carbon, simple carbon compounds, and remaining ash in the resulting coke. During the coking process, the volatile fractions of the coal are liberated and are collectively known as coke oven gas. The gas is ducted from the oven chamber into the refractory oven walls and sole flues beneath the chamber, where combustion of the gas is completed. Nucor will utilize a non-recovery design of coke ovens, instead of the more typical byproduct recovery ovens. In either design, the process of liberating the volatile fraction of the coal is done in an oxygen-deprived atmosphere. In the non-recovery oven design, the coal volatiles are oxidized within the ovens by the addition of combustion air and incinerated by the intense heat. The heat of combustion is released within the oven system, allowing non-recovery ovens to be self-sufficient with respect to energy. Non-recovery ovens are operated at a negative pressure, which results in no system leaks around oven doors and other interfaces.

The coke production process consists of the following production steps:

- Coal Preparation: Coal from the storage piles is crushed, screened, wetted, and mixed in the coal preparation area. The coal is then pressed into the shape of a large brick by hydraulic presses. The coal bricks will then be transported by a rail-mounted charging car to an oven for charging.
- Coal Charging: A pusher machine drives the coal into the oven.
- Coke Ovens: There will be two batteries of coke ovens with each battery containing 140 ovens. A coking cycle will last approximately fifty-four hours. Heat from the hot refractory in the oven begins the carbonization of the coal, and normally no external fuel is required once the ovens have reached operating temperature. The flue gas system routes the hot gases to heat recovery steam generators (HRSGs). These HRSGs produce high-pressure steam that will be routed to the steam turbine generators.
- Coke Pushing: At the end of each coking cycle, doors on the ends of the oven are opened and the hot coke is pushed from the oven by a ram which is extended from a pusher car. A mobile, flat quench car receives the hot coke. The quench car travels by rail, carrying the coke to the coke quench tower.
- Coke Quenching: The coke from the coke oven will be positioned beneath one of the coke quench towers. There is one quench tower for each coke oven battery. At the quench tower, the hot coke is deluged with water to prevent it from burning with exposure to the air. The hot steam generated from quenching is channeled by natural draft up the quench tower. Baffles in the tower structure help to retain as much of the cooling water as possible. Cooling water from the quenching process is collected beneath the quench car, filtered, and reused.

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Convent, St. James Parish, Louisiana

- Coke Handling and Storage: The quenched coke is discharged onto an inclined coke wharf to allow the coke to drain and cool before a conveyor belt carries it to a crushing and screening system. The sized coke is then transported by conveyor to the Stock House for storage. Emissions from the coke screening and crushing facilities are controlled by a baghouse.

The blast furnace is a counter-current reactor in the form of a tall, shaft-type furnace where iron-bearing materials (such as iron ore and sinter) are reduced to iron (pig iron or hot metal). A typical burden feed consists of iron ore pellets, coke, sinter, and flux materials such as limestone or dolomite. The burden material is charged into the top of the furnace and slowly descends as hot metal is removed from the bottom. Hot metal is withdrawn from the furnace and separated into molten iron and slag in the cast house.

Blast furnace gas is collected from off-takes at the top of the furnace. This gas contains a large fraction of carbon monoxide generated by the iron making reaction, as well as a sizeable fraction of hydrogen. After exiting the blast furnace, the blast furnace gas (topgas) passes through a cyclone dust catcher and dust removal system, followed by a wet scrubber system. Topgas is combusted in the hot blast stoves in order to heat the incoming blast air. Remaining topgas is burned as a fuel in power boilers to generate steam. The high pressure steam produced in the boilers will be used in steam turbines connected to electric generators. The electricity produced will likely be greater than the total site electrical requirements, and a portion may be transmitted to the public utility power grid.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Emissions (TPY)</u>
PM ₁₀	696.60
SO ₂	3,781.87
NO _x	3,791.83
CO	29,394.48
VOC	401.97

Toxic VOC included in Totals ¹	82.29
Toxic Non-VOC Compounds ¹	24.62

¹LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Emissions</u>
Ammonia	20.68
Antimony & Compounds	0.012
Arsenic & Compounds	0.100

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Consolidated Environmental Management Inc - Nucor Steel Louisiana

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Consolidated Environmental Management Inc

Convent, St. James Parish, Louisiana

'LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Emissions
Barium & Compounds	0.032
Beryllium & Compounds	0.003
Cadmium & Compounds	0.10
Chromium VI & Compounds	0.054
Cobalt & Compounds	< 0.01
Copper & Compounds	0.208
Lead & Compounds	0.375
Manganese & Compounds	0.038
Mercury & Compounds	0.289
Nickel & Compounds	0.089
Selenium & Compounds	0.022
Silver & Compounds	< 0.01
Zinc & Compounds	2.35
Acetonitrile	0.16
Acrolein	0.18
Acrylonitrile	0.79
Benzene	56.05
Bromomethane (Methyl Bromide)	0.98
Bromoform	< 0.01
Carbon Disulfide	0.03
Chlorobenzene	< 0.01
Chloroform	0.02
Chloromethane (Methyl Chloride)	1.35
Cumene	< 0.01
Cyanide	1.11
1,4-Dioxane	0.28
Dioxins/Furans	< 0.001
Ethyl Benzene	< 0.01
n-Hexane	0.022
Hydrochloric Acid	0.15
Hydrofluoric Acid	0.08
Methanol	0.14
Methyl-ethyl-ketone (2-Butanone)	0.328
Methyl-isobutyl ketone (4-Methyl-2-Pentanone)	0.336
Methyl Tert-Butyl Ether (MTBE)	< 0.01

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Consolidated Environmental Management Inc - Nucor Steel Louisiana

Agency Interest No.: 157847

Consolidated Environmental Management Inc

Convent, St. James Parish, Louisiana

¹LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Emissions
Methylene Chloride (Dichloromethane)	1.18
Methyl Methacrylate	0.31
Naphthalene	0.51
PAHs (Polynuclear Aromatic Hydrocarbons)	5.21
Phenol	11.73
Styrene	0.10
1,1,2,2-Tetrachloroethane	0.14
Toluene	1.02
1,1,1-Trichloroethane	< 0.01
1,1,2-Trichloroethane	< 0.01
Vinyl Acetate	0.28
Xylene	0.032
Total TAPs	106.91

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP).

This facility will be a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Compliance with NESHAP 40 CFR 63 Subparts L, CCCCC, and FFFFF has been determined to be compliance with MACT in accordance with LAC 33:III.5109.A.2. This permit also constitutes approval of construction of a major source of HAPs in accordance with 40 CFR 63.5(e).

PM/PM₁₀, SO₂, NO_x, CO, and VOC emissions are above PSD significance levels and must undergo PSD analyses. The requirements of PSD-LA-740 are incorporated into this permit.

V. Permit Shield

Per 40 CFR 70.6(f) and LAC 33:III.507.I, a permit shield has been determined for the proposed permit.

Emissions Source	Proposes to be Shielded From by compliance with ...	Was the Permit Shield Granted?
Coke Oven Charging	Subpart L [40 CFR 63.303(d)(2)]	BACT for Coke Oven Charging. (BACT is determined to be Flat Car Charging of Compacted Coke)	Yes

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VI. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VII. Public Notice

A notice requesting public comment on the proposed permits was published in *The Enterprise*, Vacherie, on October 15, 2008; and in *The Advocate*, Baton Rouge, and in *The News Examiner*, Convent, on October 16, 2008. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on October 13, 2008. A public hearing was held on Thursday, November 20, 2008, at the St. James Parish Courthouse, Courtroom A, 5800 LA Hwy 44, Convent, LA. The proposed permit was also submitted to US EPA Region VI on October 9, 2008.

After the conclusion of the comment period, additional submittals by Nucor necessitated another comment period. Therefore, a second notice requesting public comment on the proposed permits was published in *The Enterprise*, Vacherie, on September 2, 2009; and in *The Advocate*, Baton Rouge, and in *The News Examiner*, Convent, on September 3, 2009. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on August 31, 2009. A public hearing was scheduled for Tuesday, October 6, 2008, at the St. James Parish Courthouse, Courtroom A, 5800 LA Hwy 44, Convent, LA. However, prior to the public hearing, EPA provided input specifically regarding Nucor Steel Louisiana's application by letter dated September 24, 2009.

As noted in the EPA Administrator's recent petition decision in the matter of Louisville Gas and Electric Company (Petition No. IV-2008-3, August 12, 2009) we believe that permit applicants and permitting authorities should determine whether PM10 is a reasonable surrogate for PM2.5 under the specific facts and circumstances of specific permitting actions, and not proceed with the general presumption that PM10 is always a reasonable surrogate for PM2.5. Therefore, we believe LDEQ should ... address PM2.5 emissions directly or show how compliance with the PSD requirements for PM10 will serve as an adequate surrogate for meeting the PSD requirements for PM2.5 for this specific facility. Directly addressing PM2.5 might

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Convent, St. James Parish, Louisiana

including determining the best available control technology (BACT) for PM_{2.5} and determining the proposed source's impact on currently monitored PM_{2.5} concentrations in relation to the current PM_{2.5} NAAQS.

Consequently, the public comment period and hearing were canceled so that LDEQ could address PM_{2.5} in the proposed permits.

A third notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on March XX, 2010; in *The Enterprise*, Vacherie, on March XX, 2010; and in *The News Examiner*, Convent on March XX, 2010. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on March XX, 2010. The revised draft permit was also submitted to US EPA Region VI on March XX, 2010. All comments will be considered prior to the final permit decision.

VIII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS.

Dispersion Model Used: AERMOD

Pollutant	Averaging Period	National Ambient Air Quality Standard (NAAQS)	Calculated Maximum Ground Level Concentration (All sources plus Background)	Allowed Level of Significant Impact	Calculated Maximum Ground Level Concentration (Nucor Contribution)
PM _{2.5}	24-hour	35 µg/m ³	117.93 µg/m ³ *	1.2 µg/m ³	0.9216 µg/m ³
PM _{2.5}	Annual	15 µg/m ³	35.65 µg/m ³ *	0.3 µg/m ³	0.0615 µg/m ³
PM ₁₀	24-hour	150 µg/m ³	4152.35 µg/m ³ *	5 µg/m ³	1.58 µg/m ³
SO ₂	3-hour	1,300 µg/m ³	8479.19 µg/m ³ *	25 µg/m ³	17.28 µg/m ³
SO ₂	24-hour	365 µg/m ³	2181.57 µg/m ³ *	5 µg/m ³	3.72 µg/m ³
SO ₂	Annual	80 µg/m ³	361.01 µg/m ³ *	1 µg/m ³	0.24 µg/m ³
NO _x	Annual	100 µg/m ³	54.0 µg/m ³	-	-
CO**	1-hour	40,000 µg/m ³	856.2 µg/m ³	-	-
CO**	8-hour	10,000 µg/m ³	475.7 µg/m ³	-	-
Lead**	3 month rolling avg	0.15 µg/m ³	<0.01 µg/m ³	-	-

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Consolidated Environmental Management Inc - Nucor Steel Louisiana

Agency Interest No.: 157847

Consolidated Environmental Management Inc

Convent, St. James Parish, Louisiana

Dispersion Model Used: AERMOD

Pollutant	Averaging Period	National Ambient Air Quality Standard {NAAQS}	Calculated Maximum Ground Level Concentration***
PM _{2.5}	24-hour	35 µg/m ³	5.30 µg/m ³
PM _{2.5}	Annual	15 µg/m ³	1.54 µg/m ³
PM ₁₀	24-hour	150 µg/m ³	28.06 µg/m ³
SO ₂	3-hour	1,300 µg/m ³	94.18 µg/m ³
SO ₂	24-hour	365 µg/m ³	38.68 µg/m ³
SO ₂	Annual	80 µg/m ³	8.39 µg/m ³

* The numbers in the permit application represent the original NAAQS modeling. These values represent the highest numbers after refining the model, per the description below.

**From significance modeling. Includes Nucor sources only and does not include background.

*** These values represent Nucor's sources only; these values include receptors at which an exceedance did not occur and for which it was not necessary to compare Nucor's contribution to the significance level. For short term standards, this number is represented by the highest second high value; this number is used for comparison purposes only. A full description on how compliance was determined follows these tables.

Dispersion Model Used: CALPUFF (Class I)

Pollutant	Averaging Period	Allowed Class I PSD Increment	Modeled Class I Increment* (All modeled facilities)	Allowed Level of Significant Impact	NUCOR contribution to Increment
PM ₁₀	24 - hour	8 µg/m ³	0.18 µg/m ³		
SO ₂	3 -hour	25 µg/m ³	62.9 µg/m ³	1.0 µg/m ³	< 1.0 µg/m ³
SO ₂	24 - hour	5 µg/m ³	31.9 µg/m ³	0.2 µg/m ³	< 0.2 µg/m ³
SO ₂	Annual	2 µg/m ³	0.010 µg/m ³		
NO _x	Annual	2.5 µg/m ³	0.0069 µg/m ³		

* When the modeled value from all surrounding facilities and Nucor's contribution exceed the allowed Class I PSD Increment, then EPA allows Nucor's contribution to be compared to the allowed Level of Significant Impact. At locations where Nucor's contribution was deemed significant, the model determined that the contribution from Nucor and all surrounding facilities did not exceed the allowed Class I PSD Increment.

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Consolidated Environmental Management Inc

Convent, St. James Parish, Louisiana

Dispersion Model Used: AERMOD (Class II)

Pollutant	Averaging Period	Class II PSD Increment	Modeled Class II Increment** (All modeled facilities)	Allowed Level of Significant Impact	NUCOR contribution to Increment
PM ₁₀	24 - hour	30 µg/m ³	14,022.9 µg/m ³ ***	5 µg/m ³	3.22 µg/m ³
SO ₂	3 -hour	512 µg/m ³	8471.4 µg/m ³ ***	25 µg/m ³	17.28 µg/m ³
SO ₂	24 - hour	91 µg/m ³	2036.1 µg/m ³ ***	5 µg/m ³	3.73 µg/m ³
SO ₂	Annual	20 µg/m ³	306.1 µg/m ³ ***	1 µg/m ³	0.24 µg/m ³
NO _x	Annual	25 µg/m ³	7.43 µg/m ³		

Dispersion Model(s) Used: AERMOD (Class II)

Pollutant	Averaging Period	Class II PSD Increment	Modeled Class II Increment****
PM ₁₀	24 - hour	30 µg/m ³	28.06 µg/m ³
SO ₂	3 -hour	512 µg/m ³	94.18 µg/m ³
SO ₂	24 - hour	91 µg/m ³	38.68 µg/m ³
SO ₂	Annual	20 µg/m ³	8.39 µg/m ³

** When the modeled value from all surrounding facilities and Nucor's contribution exceed the allowed Class II PSD Increment, then EPA allows Nucor's contribution to be compared to the Allowed Level of Significant Impact. Where Nucor's contribution was deemed significant and the receptor was located on other industrial property, the emissions for the facility to which the property belongs were removed from the model. The model was then rerun to determine if any exceedances of the NAAQS or PSD increment occurred. If Nucor's contribution was deemed significant and the receptor was not located on other industrial property, Nucor analyzed whether it had an impact above the significance level at the receptor of concern at the time during which the receptor exceeded the respective standards.

*** The numbers in the permit application represent the original PSD increment modeling. These values represent the highest numbers after refining the model, per the description below.

**** These values represent Nucor's sources only; these values include receptors at which an exceedance did not occur and for which it was not necessary to compare Nucor's contribution to the significance level. For short term standards, this number is represented by the highest second high value; this number is used for comparison purposes only. A full description on how compliance was determined is above these tables.

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Convent, St. James Parish, Louisiana

Dispersion Model Used: AERMOD

Pollutant	Averaging Period	Calculated Maximum Ground Level Concentration	Ambient Air Standard {AAS}
Acrolein	8-hour	0.041 µg/m ³	5.4 µg/m ³
Acrylonitrile	Annual	0.0077 µg/m ³	1.47 µg/m ³
Ammonia	8-hour	4.77 µg/m ³	640 µg/m ³
Arsenic (and compounds)	Annual	0.00017 µg/m ³	0.02 µg/m ³
Barium (and compounds)	8-hour	0.0057 µg/m ³	11.9 µg/m ³
Benzene	Annual	0.54 µg/m ³	12 µg/m ³
Chromium (and compounds)	Annual	0.00009 µg/m ³	0.01 µg/m ³
Copper (and compounds)	8-hour	0.00659 µg/m ³	23.8 µg/m ³
Chlorinated dibenzo-p-dioxins	Annual	0.00001 µg/m ³	0.003 µg/m ³
Dichloromethane	Annual	0.00085 µg/m ³	212.77 µg/m ³
Hydrofluoric Acid	8-hour	0.001 µg/m ³	61.9 µg/m ³
Mercury (and compounds)	8-hour	0.00322 µg/m ³	1.19 µg/m ³
Naphthalene (and Methylnaphthalenes)	8-hour	0.46 µg/m ³	1190 µg/m ³
Nickel (and compounds)	Annual	0.0002 µg/m ³	0.21 µg/m ³
Polynuclear aromatic hydrocarbons	Annual	0.032 µg/m ³	0.06 µg/m ³
Phenol	8-hour	2.68 µg/m ³	452 µg/m ³
Zinc (and compounds)	8-hour	0.014 µg/m ³	119 µg/m ³

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. Modeling was conducted by the facility for all criteria pollutants and for all toxic air pollutants (TAP) emitted above the minimum emission rate.

One TAP, PAHs, exceeded 7.5% of the AAS; however, no outside sources of PAHs were within the impact area defined by the screening model. PAHs were below 75% of the AAS. All other TAPs were below 7.5% of the respective AAS in the screening models.

CO and lead were below the respective modeling significance levels for each averaging period in the screening models; NO_x, PM₁₀, PM_{2.5}, and SO₂ were above the modeling significance levels and refined modeling was conducted for these pollutants. The NO_x refined modeling demonstrated compliance with both the NAAQS and PSD increment level at all receptor locations. PM₁₀, PM_{2.5}, and SO₂ refined modeling demonstrated exceedances at receptor locations in both the NAAQS and PSD increment models. There is currently no PSD increment for PM_{2.5}, and so, only further analysis of the NAAQS receptor exceedances was required.

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To further refine the PM₁₀, PM_{2.5}, and SO₂ models, Nucor first determined if it had an impact above the significance level at the receptors of concern. Where Nucor's contribution was deemed significant and the receptor was located on other industrial property, the emissions for the facility to which the property belongs were removed from the model. The model was then rerun to determine if any exceedances of the NAAQS or PSD increment occurred. If Nucor's contribution was deemed significant and the receptor was not located on other industrial property, Nucor analyzed whether it had an impact above the significance level at the receptor of concern at the time during which the receptor exceeded the respective standards. Based on the modeling received by LDEQ, no exceedances occur on other industrial property when the property owner's emissions are removed and Nucor is not significant at any of the modeled receptors at the time of an exceedance. The determination of significant contribution to an existing exceedance was performed in accordance with the July 5, 1988 memorandum, subject: "Air Quality Analysis for Prevention of Significant Deterioration", from Gerald A. Emison, Director, Office of Air Quality Planning and Standards to Thomas J. Maslany, Director, Air Management Division.

Additionally, Nucor provided CAMx modeling to demonstrate the effects of the facility's emissions on ozone in the surrounding area. The modeling was reviewed by LDEQ and US EPA Region 6, and it was determined that the facility would not cause a significant impact to ozone in the surrounding area. For the exposure based tabular metrics (exceedance exposure, exposure greater than 80 ppb, grid cell hours greater than 80 ppb), the Nucor facility emissions contribute approximately 3-6% in excess of the results in the base case modeling. For the grid cells greater 80 ppb anytime during the episode, the Nucor emissions contribute very slightly, 0.3 to 1.0 percent. For the daily maximum near a monitor station metric, the metric that is used to calculate the future year design value that determines the modeled attainment designation in the region, the ozone from the Nucor facility contributes a maximum 0.88% increase, and on the majority of days a less than 0.1% increase.

A Class I area impact analysis was performed to determine the effect of this proposed project on the Breton Sound Class I Area. This Class I area is located approximately 187 kilometers from the Nucor Steel Louisiana Facility. The protocol for the Class I area impact analysis was reviewed and approved by the Federal Land Manager of the Breton Sound Class I Area and LDEQ. The Class I area impact analysis included air quality impact, deposition impact, and visibility impairment analyses. The results of these analyses showed that for the three different operating scenarios (normal operation, maintenance case 1A, and maintenance case 2A) the facility will not have an adverse impact on the Class I area. When the modeled value from all surrounding facilities and Nucor's contribution exceed the allowed Class I PSD Increment, then EPA allows Nucor's contribution to be compared to the allowed Level of Significant Impact. At locations where Nucor's contribution was deemed significant, the model determined that the contribution from Nucor and all surrounding facilities did not exceed the allowed Class I PSD Increment.

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IX. General Condition XVII Activities

Work Activity	Schedule	PM ₁₀	Emission Rates - tons		
			SO ₂	NO _x	CO

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. A list of approved General Condition XVII Activities has not been submitted at this time and therefore the proposed permit does not include any identified General Condition XVII Activities.

X. Insignificant Activities

<u>ID No.:</u>	<u>Description</u>	<u>Citation</u>
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A list of approved Insignificant Activities has not been submitted at this time and therefore the proposed permit does not include any identified Insignificant Activities.

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	[LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	17	2103	2107	2113	2115	2116*	21xx	22	29*	51*	53*	56	59*
UNF 1	Nucor Steel Louisiana	1	1	1	1	1							1				1	1	1	1
EQT 53	Stock House 1 Baghouse Vent																			
EQT 54	Stock House 2 Baghouse Vent																			
EQT 15	Cast House 1 Baghouse Vent																			
EQT 16	Cast House 2 Baghouse Vent																			
EQT 36	Slag Granulator 1 Granulation Tank 1																			
EQT 37	Slag Granulator 1 Granulation Tank 2																			
ARE 5	Blast Furnace 1 Slag Pit 1																			
ARE 6	Blast Furnace 1 Slag Pit 2																			
ARE 7	Blast Furnace 1 Slag Pit 3																			
EQT 38	Slag Granulator 2 Granulation Tank 1	1																		
EQT 39	Slag Granulator 2 Granulation Tank 2	1																		
ARE 8	Blast Furnace 2 Slag Pit 1																			
ARE 9	Blast Furnace 2 Slag Pit 2																			
ARE 10	Blast Furnace 2 Slag Pit 3																			
EQT 40	Air-Cooled Slag Processing Load Bin																			
	Air-Cooled Slag Processing Primary																			
	EQT 41 Crusher																			

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	17	2103	2107	2113	2115	2116*	21xx	22	29*	51*	53*	56	59*
EQT 42	Air-Cooled Slag Processing Primary Screening			1		1														
EQT 43	Air-Cooled Slag Processing Secondary Crusher				1			1												
EQT 44	Air-Cooled Slag Processing Secondary Screen					1		1												
ARE 11	Air-Cooled Slag Processing Stockpiles						1													
EQT 45	Slag Mill Wet Slag Feed Bin							1												
RLP 14	Slag Mill Dryer Stack								1	1	2									
EQT 46	Slag Mill Dryer Baghouse Vent								1		1									
EQT 47	Slag Mill Dry Slag Feed Bin Baghouse Vent									1		1								
EQT 48	Slag Mill Crushers/Screener Baghouse Vent									1		1								
EQT 49	Slag Mill Building Baghouse Vent									1		1								
EQT 50	Slag Mill Transfer Points Baghouse Vent										1		1							
EQT 51	Slag Mill Product Silo Baghouse Vent										1		1							
EQT 52	Slag Mill Loading Collector Baghouse Vent											1		1						
EQT 21	Iron Desulfurization Station Baghouse Vent											1		1						

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	17	2103	2107	2113	2115	2116*	21xx	22	29*	51*	53*	56	59*
EQT 22	Iron Solidification Building		1		1															
ARE 1	Coke Ovens Coal Handling, Crushing and Compacting		1		1															
EQT 1	Coke Battery 1 Coal Charging		1		1												1			
EQT 2	Coke Battery 1 Coke Pushing		1		1			2									1			
EQT 3	Coke Battery 1 Coke Quench Tower		1		1												1			
EQT 4	Coke Battery 1 Coke Handling		1		1															
RLP 1	Coke Battery 1 HRSG Bypass Vent Stack 1		1		2	1											2			
RLP 2	Coke Battery 1 HRSG Bypass Vent Stack 2		1		2	1											2			
RLP 3	Coke Battery 1 HRSG Bypass Vent Stack 3		1		2	1											2			
RLP 4	Coke Battery 1 HRSG Bypass Vent Stack 4		1		2	1											2			
RLP 5	Coke Battery 1 HRSG Bypass Vent Stack 5		1		2	1											2			
RLP 6	Coke Battery 1 Flue Gas Desulfurization Stack		1		1	1											1			
EQT 5	Coke Battery 1 FGD Lime Silo Unloading		1		1															
EQT 6	Coke Battery 1 FGD Waste Loading		1		1															

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter											
EQT 7	Coke Battery 2 Coal Charging	5▲	509	9	11	13	15	17	2103	2107	2113	2115	2116*
EQT 8	Coke Battery 2 Coke Pushing		1		1								
EQT 9	Coke Battery 2 Coke Quench Tower		1		1								
EQT 10	Coke Battery 2 Coke Handling		1		1								
RLP 7	Coke Battery 2 HRSG Bypass Vent Stack 1		1		2	1							
RLP 8	Coke Battery 2 HRSG Bypass Vent Stack 2		1		2	1							
RLP 9	Coke Battery 2 HRSG Bypass Vent Stack 3		1		2	1							
RLP 10	Coke Battery 2 HRSG Bypass Vent Stack 4		1		2	1							
RLP 11	Coke Battery 2 HRSG Bypass Vent Stack 5		1		2	1							
RLP 12	Coke Battery 2 Flue Gas Desulfurization Stack		1		1	1							
EQT 11	Coke Battery 2 FGD Lime Silo Unloading		1		1	1							
EQT 12	Coke Battery 2 FGD Waste Loading		1		1								
EQT 13	Coke Bin Tower		1		1								
EQT 14	Coke Screening		1		1								
RLP 13	PCI Mill Vent		1		1	1							

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	17	2103	2107	2113	2115	2116*	21xx	22	29*	51*	53*	56	59*
EQT 31	MEROS System Vent Stack			1	1	1	1	1												1
EQT 32	Sinter Plant Main Dedusting Baghouse Vent			1		1														1
EQT 33	Coke and Petcoke Crushing Dedusting Baghouse Vent			1		1														
FUG 9	Sinter Building Fugitives			1		1														
EQT 34	Sinter FGD Lime Silo Unloading			1		1														
EQT 35	Sinter FGD Waste Loading			1		1														
EQT 19	Blast Furnace 1 Tropgas Dust Catcher			1		1														
EQT 20	Blast Furnace 2 Tropgas Dust Catcher			1		1														
EQT 23	Tropgas Boiler No. 1			1	1	1	1	1											3	
EQT 24	Tropgas Boiler No. 2			1	1	1	1	1											3	
EQT 25	Tropgas Boiler No. 3			1	1	1	1	1											3	
EQT 26	Tropgas Boiler No. 4			1	1	1	1	1											3	
EQT 27	Tropgas Boiler No. 5			1	1	1	1	1											3	
EQT 28	Tropgas Boiler No. 6			1	1	1	1	1											3	
EQT 29	Tropgas Boiler No. 7			1	1	1	1	1											3	
EQT 30	Tropgas Boiler No. 8			1	1	1	1	1											3	
RLP 15	Blast Furnace 1 Hot Blast Stoves Common Stack			1	1	1	1	1											3	

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ID No:	Description	LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	17	2103	2107	2113	2115	2116*	21xx	22	29*	51*	53*	56	59*
EQT 55	Blast Furnace 1 Topgas Flare Pilot				1	1	1													
RLP 16	Common Stack				1	1	1	1												
EQT 56	Blast Furnace 2 Topgas Flare Pilot				1	1	1	1												
EQT 17	Dock 1 Loading/Unloading Gantry Crane				1	1	1													
EQT 18	Dock 2 Loading/Unloading Gantry Crane				1	1	1													
EQT 59	Wagon Tipper				1	1	1													
FUG 1	Coal Storage Piles				1	1	1													
FUG 2	Iron Ore Pellet Storage Piles				1	1	1													
FUG 3	Flux Storage Piles				1	1	1													
FUG 4	Granulated Pig Iron Storage Piles				1	1	1													
FUG 5	Granulated Slag Storage Piles				1	1	1													
FUG 6	Sinter Storage Piles				1	1	1													
FUG 7	Coke Breeze Storage Piles				1	1	1													
FUG 8	Mill Scale Storage Piles				1	1	1													
ARE 2	Unpaved Road Fugitive Dust				1	1	1													
ARE 3	Paved Road Fugitive Dust				1	1	1													

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ID No.:	Description	LAC 33:III.Chapter																	
		5▲	509	9	11	13	15	17	2103	2107	2113	2115	2116*	21xx	22	29*	51*	53*	56
ARE 4	Conveyor Fugitives		1		1														
EQT 60	Blast Furnaces Cooling Tower		1																
EQT 61	Iron Solidification Cooling Tower		1																
EQT 62	Air Separation Plant Cooling Tower		1																
EQT 57	Gasoline Storage Tank												1						
EQT 58	Diesel Storage Tank														3				

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHAP				40 CFR				
		A	D	Da	Db	Dc	Kb	N	Na	Y	Z	AA	AAa	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	52	64
UNF 1	Nucor Steel Louisiana	1						3	3	3	3	3	3	3	3	3	3	1			1	1
EQT 53	Stock House 1 Baghouse Vent																					
EQT 54	Stock House 2 Baghouse Vent																					
EQT 15	Cast House 1 Baghouse Vent																		1			
EQT 16	Cast House 2 Baghouse Vent																	1				
EQT 36	Slag Granulator 1 Granulation Tank 1																	1				
EQT 37	Slag Granulator 1 Granulation Tank 2																	1				
ARE 5	Blast Furnace 1 Slag Pit 1																					
ARE 6	Blast Furnace 1 Slag Pit 2																					
ARE 7	Blast Furnace 1 Slag Pit 3																					
EQT 38	Slag Granulator 2 Granulation Tank 1																					
EQT 39	Slag Granulator 2 Granulation Tank 2																					
ARE 8	Blast Furnace 2 Slag Pit 1																					
ARE 9	Blast Furnace 2 Slag Pit 2																					
ARE 10	Blast Furnace 2 Slag Pit 3																					

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X1. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHAP				40 CFR				
		A	D	Da	Dc	Kb	N	Na	Y	Z	AA	AAa	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	52	64	68
EQT 40	Air-Cooled Slag Processing Load Bin																					
EQT 41	Air-Cooled Slag Processing Primary Crusher																					
EQT 42	Air-Cooled Slag Processing Primary Screening																					
EQT 43	Air-Cooled Slag Processing Secondary Crusher																					
EQT 44	Air-Cooled Slag Processing Secondary Screen																					
ARE 11	Air-Cooled Slag Processing Stockpiles																					
EQT 45	Slag Mill Wet Slag Feed Bin																					
RLP 14	Slag Mill Dryer Stack																					
EQT 46	Slag Mill Dryer Baghouse Vent																					
EQT 47	Slag Mill Dry Slag Feed Bin Baghouse Vent																					
EQT 48	Slag Mill Crushers/Screencers Baghouse Vent																					
EQT 49	Slag Mill Building Baghouse Vent																					
EQT 50	Slag Mill Transfer Points Baghouse Vent																					

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHAP				40 CFR					
		A	D	Da	Db	Dc	Kb	N	Na	Y	Z	AA	AAa	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	52	64	68
EQT 51	Slag Mill Product Silo Baghouse Vent																						
EQT 52	Slag Mill Loading Collector Baghouse Vent																						
EQT 21	Iron Desulfurization Station Baghouse Vent																						
EQT 22	Iron Solidification Building																						
ARE 1	Coke Ovens Coal Handling, Crushing and Compacting	1																					
EQT 1	Coke Battery 1 Coal Charging																			1	3		
EQT 2	Coke Battery 1 Coke Pushing																			1	1		
EQT 3	Coke Battery 1 Coke Quench Tower																			3	1		
EQT 4	Coke Battery 1 Coke Handling																						
RLP 1	Coke Battery 1 HRSG Bypass Vent Stack 1	3	3	3	3																3		
RLP 2	Coke Battery 1 HRSG Bypass Vent Stack 2	3	3	3	3																3		
RLP 3	Coke Battery 1 HRSG Bypass Vent Stack 3	3	3	3	3															3			
RLP 4	Coke Battery 1 HRSG Bypass Vent Stack 4	3	3	3	3															3			

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHPAP				40 CFR-R				
		A	D	Da	D _b	D _c	K _b	N	N _a	Y	Z	AA	AA _a	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	S2	64
RLP 5	Coke Battery 1 HRSG Bypass Vent Stack 5	3	3	3																	3	
RLP 6	Coke Battery 1 Flue Gas Desulfurization Stack																				3	
EQT 5	Coke Battery 1 FGD Lime Silo Unloading																					
EQT 6	Coke Battery 1 FGD Waste Loading																					
EQT 7	Coke Battery 2 Coal Charging																			1	3	
EQT 8	Coke Battery 2 Coke Pushing																			1	1	
EQT 9	Coke Battery 2 Coke Quench Tower																		3	1		
EQT 10	Coke Battery 2 Coke Handling																		1			
RLP 7	Coke Battery 2 HRSG Bypass Vent Stack 1	3	3	3	3															3		
RLP 8	Coke Battery 2 HRSG Bypass Vent Stack 2	3	3	3	3															3		
RLP 9	Coke Battery 2 HRSG Bypass Vent Stack 3	3	3	3	3															3		
RLP 10	Coke Battery 2 HRSG Bypass Vent Stack 4	3	3	3	3															3		

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ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHAP											
		A	D	Da	D _b	Dc	K _b	N	N _a	Y	Z	AA	AA _a	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	52	64	68		
RLP 11	Coke Battery 2 HRSG Bypass Vent Stack 5																								
RLP 12	Coke Battery 2 Flue Gas Desulfurization Stack																								
EQT 11	Coke Battery 2 FGD Lime Silo Unloading																								
EQT 12	Coke Battery 2 FGD Waste Loading																								
EQT 13	Coke Bin Tower																								
EQT 14	Coke Screening																1								
RLP 13	PCI Mill Vent																								
EQT 31	MEROS System Vent Stack																	1							
EQT 32	Sinter Plant Main Dedusting Baghouse Vent																		1						
EQT 33	Coke and Petcoke Crushing Dedusting Baghouse Vent																								
FUG 9	Sinter Building Fugitives																		1						
EQT 34	Sinter FGD Lime Silo Unloading																								
EQT 35	Sinter FGD Waste Loading																								
EQT 19	Blast Furnace 1 Topgas Dust Catcher																								

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X1. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHAP				40 CFR					
		A	D	Da	Db	Dc	Kb	N	Na	Y	Z	AA	AAa	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	52	64	68
EQT 20	Blast Furnace 2 Topgas Dust Catcher																						
EQT 23	Topgas Boiler No. 1	1	1	3	3	3																	
EQT 24	Topgas Boiler No. 2	1	1	3	3	3																	
EQT 25	Topgas Boiler No. 3	1	1	3	3	3																	
EQT 26	Topgas Boiler No. 4	1	1	3	3	3																	
EQT 27	Topgas Boiler No. 5	1	1	3	3	3																	
EQT 28	Topgas Boiler No. 6	1	1	3	3	3																	
EQT 29	Topgas Boiler No. 7	1	1	3	3	3																	
EQT 30	Topgas Boiler No. 8	1	1	3	3	3																	
RLP 15	Blast Furnace 1 Hot Blast Stoves Common Stack																						
EQT 55	Blast Furnace 1 Topgas Flare Pilot																						
EQT 54	Blast Furnace 2 Hot Blast Stoves Common Stack																						
EQT 56	Blast Furnace 2 Topgas Flare Pilot																						
EQT 17	Dock 1 Loading/Unloading Gantry Crane																						

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHAP				40 CFR					
		A	D	Da	Db	Dc	Kb	N	Na	Y	Z	AA	AAa	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	52	64	68
EQT 18	Dock 2 Loading/Unloading Gantry Crane																						
EQT 59	Wagon Tipper																						
FUG 1	Coal Storage Piles																						
FUG 2	Iron Ore Pellet Storage Piles																						
FUG 3	Flux Storage Piles																						
FUG 4	Granulated Pig Iron Storage Piles																						
FUG 5	Granulated Slag Storage Piles																						
FUG 6	Sinter Storage Piles																						
FUG 7	Coke Breeze Storage Piles																						
FUG 8	Mill Scale Storage Piles																						
ARE 2	Unpaved Road Fugitive Dust																						
ARE 3	Paved Road Fugitive Dust																						
ARE 4	Conveyor Fugitives																						
EQT 60	Blast Furnaces Cooling Tower																				3		
EQT 61	Iron Sulfidification Cooling Tower																				3		
EQT 62	Air Separation Plant Cooling Tower																				3		

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XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 63 NESHAP				40 CFR		40 CFR		
		A	D	Da	Dc	Kb	N	Na	Y	Z	AA	AAA	LL	OOO	UUU	AL	Q	CCCCC	FFFFF	S2	64	68
EQT 57	Gasoline Storage Tank						3															
EQT 58	Diesel Storage Tank												3									

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source...
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Nucor Steel Louisiana UNF 1	LAC 33:III.5911 - Chemical Accident Prevention and Minimization of Consequences	Exempt	Requires each stationary source that has a covered process as defined by 40 CFR 68.3 to register with the Office of Environmental Compliance, and to submit a single Risk Management Plan (RMP), as provided in 68.150 and 68.185. This facility is exempt, as it will not meet the definition of a covered process (will not produce, process, handle, or store substances listed in 40 CFR 68.130 in quantities greater than the threshold quantities).	LAC 33:III.5911.A, 40 CFR 68.3
	40 CFR 60 Subpart N - Standards Of Performance For Primary Emissions From Basic Oxygen Process Furnaces For Which Construction Is Commenced After June 11, 1973	Does Not Apply	The affected facility to which the provisions of this subpart apply is each basic oxygen process furnace. The facility will not construct a basic oxygen process furnace.	40 CFR 60.140(a)
	40 CFR 60 Subpart Na - Of Performance For Secondary Emissions From Basic oxygen Process Steelmaking Facilities For Which Construction Is Commenced After January 20, 1983	Does Not Apply	The provisions of this subpart apply to the following affected facilities in an iron and steel plant: top-blown BOF's and hot metal transfer stations and skimming stations used with bottom-blown or top-blown BOF's. The facility will not construct a BOF.	40 CFR 60.140(a)(a)

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
	40 CFR 60 Subpart Z - Standards Of Performance For Ferroalloy Production Facilities	Does Not Apply	Applies to the following affected facilities: Electric submerged arc furnaces which produce silicon metal, ferrosilicon, calcium silicon, silicomanganese zirconium, ferrochrome silicon, silvery iron, high-carbon ferrochrome, charge chrome, standard ferromanganese, silicomanganese, ferromanganese silicon, or calcium carbide; and dust-handling equipment. This facility will not include electric submerged arc furnaces producing these materials.	40 CFR 60.260(a)
Nucor Steel Louisiana UNF 1	40 CFR 60 Subpart AA - Standards Of Performance For Steel Plants: Electric Arc Furnaces Constructed After October 21, 1974 And On Or Before August 17, 1983	Does Not Apply	Applies to the following affected facilities in steel plants that produce carbon, alloy, or specialty steels: electric arc furnaces and dust-handling systems. This facility will not qualify as a steel plant producing carbon, alloy, or specialty steels.	40 CFR 60.270(a)
	40 CFR 60 Subpart AAa - Standards Of Performance For Steel Plants: Electric Arc Furnaces And Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983	Does Not Apply	Applies to the following affected facilities in steel plants that produce carbon, alloy, or specialty steels: electric arc furnaces, argon-oxygen decarburization vessels, and dust-handling systems. This facility will not qualify as a steel plant producing carbon, alloy, or specialty steels.	40 CFR 60.270(a)

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Nucor Steel Louisiana UNF 1	40 CFR 60 Subpart LL - Standards Of Performance For Metallic Mineral Processing Plants	Does Not Apply	<i>Metallic mineral processing plant</i> means any combination of equipment that produces metallic mineral concentrates from ore. Metallic mineral processing commences with the mining of ore and includes all operations either up to and including the loading of wet or dry concentrates or solutions of metallic minerals for transfer to facilities at non-adjacent locations that will subsequently process metallic concentrates into purified metals (or other products). The facility will not qualify as a metallic mineral processing plant as this facility is the non-adjacent location.	40 CFR 60.380(a)
	40 CFR 60 Subpart OOO - Standards Of Performance For Nonmetallic Mineral Processing Plants	Does Not Apply	Applies to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. This facility will not process nonmetallic minerals.	40 CFR 60.670(a)(1)
	40 CFR 60 Subpart UUJ - Standards Of Performance For Calciners And Dryers In Mineral Industries	Does Not Apply	Applies to each calciner and dryer at a mineral processing plant. This facility will not meet the definition of a mineral processing plant.	40 CFR 60.730(a)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Slag Granulation Tanks SLG-101, SLG-102, SLG-201, SLG-202 (EQT036-039)	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide .	Exempt	Single point sources that emit or have the potential to emit less than 250 tons per year of sulfur compounds measured as sulfur dioxide may be exempted from the 2,000 ppm(v) limitation by the administrative authority. The owner or operator of any emissions unit that is not subject to the emissions limitations of this Chapter shall record and retain at the site sufficient data to show annual potential sulfur dioxide emissions from the emissions unit.	LAC 33:III.1503.C, LAC 33:III.1515.C
Slag Granulation Tanks SLG-101, SLG-102, SLG-201, SLG-202 (Cont.) (EQT036-039)	LAC 33:III.2103 - Volatile Organic Compounds - Storage of Volatile Organic Compounds	Does Not Apply	This tank will not be used to store volatile organic compounds.	LAC 33:III.2103.A, B
	40 CFR 60 Subpart Kb - New Source Performance Standards	Does Not Apply	This Subpart applies to vessels storing volatile organic liquids with a capacity greater than 75 m ³ . The slag granulation tanks will not store volatile organic liquids.	40 CFR 60.110b
	For Volatile Liquid Storage Vessels (Including Petroleum Storage Vessels) For Which Construction, Reconstruction or Modification Commenced After July 23, 1984			

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Slag Pits SLG-104, SLG-105, SLG-106, SLG-204, SLG-205, SLG-206 (ARE005-010)	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide	Exempt	Single point sources that emit or have the potential to emit less than 250 tons per year of sulfur compounds measured as sulfur dioxide may be exempted from the 2,000 ppm(v) limitation by the administrative authority. The owner or operator of any emissions unit that is not subject to the emissions limitations of this Chapter shall record and retain at the site sufficient data to show annual potential sulfur dioxide emissions from the emissions unit.	LAC 33:III.1503.C, LAC 33:III.1515.C
Slag Mill Dryer SLG-402 (RLP014)	LAC 33:III.1313 - Emissions from Fuel Burning Equipment	Exempt	Applies to any operation, process, or activity from which particulate matter is emitted except the wood pulping industry, the primary aluminum industry (horizontal stud Soderberg and prebake processes), and the burning of fuel for indirect heating in which the products of combustion do not come into direct contact with process materials. The dryers will be used for the burning of fuel for indirect heating as described above, and are therefore exempt.	LAC 33:III.1313.B
Coke Charging COK-101, COK-201 (EQT001,007)	40 CFR 63 Subpart CCCCC - National Emission Standards For Hazardous Air Pollutants For Coke Ovens: Pushing, Quenching and Battery Stacks	Does Not Apply	This Subpart does apply to Coke Oven Pushing operations, but not to Coke Oven Charging operations.	40 CFR 63.7282(b)

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Coke Quenching COK-103, COK-203 (EQT003,009)	40 CFR 63 Subpart L - National Emission Standards for Coke Oven Batteries	Does Not Apply	This Subpart does not apply to Coke Oven Battery quenching operations.	40 CFR 64.300 and 301
Coke Battery 1 & 2 HRSG Bypass Stacks	40 CFR 60 Subpart D - Standards Of Performance For Fossil-Fuel Fired Steam Generators For Which Construction Is Commenced After August 17, 1971	Does Not Apply	Applies to fossil fuel fired and wood residue fired steam generators constructed or modified after August 17, 1971. The Heat Recovery Steam Generators will not be supplementally fired with any fuels.	40 CFR 60.40(a)
COK-105, through COK-109, COK-205, through COK-209 (RLP001-005, RLP007-011)	40 CFR 60 Subpart Da - Standards Of Performance For Electric Utility Steam Generating Units For Which Construction Is Commenced After September 18, 1978	Does Not Apply	Applies to each electric utility steam generating unit: (1) That is capable of combusting more than 250 MMbtu/hr heat input of fossil fuel; and (2) For which construction, modification, or reconstruction is commenced after September 18, 1978. The Heat Recovery Steam Generators will not be supplementally fired with fossil fuels.	40 CFR 60.40(a)

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
through COK-209 (RLP001-005, RLP007-011)	40 CFR 60 Subpart Db - Standards Of Performance For Industrial-Commercial-Institutional Steam Generating Units	Does Not Apply	Applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 MM(Btu/hr). The Heat Recovery Steam Generators will not be supplementally fired with fossil fuels.	40 CFR 60.40b(a)
	40 CFR 60 Subpart Dc - Standards Of Performance For Small Industrial-Commercial-Institutional Steam Generating Units	Does Not Apply	Applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MM(Btu/hr) or less, but greater than or equal to 10 MM(Btu/hr). The Heat Recovery Steam Generators will not be supplementally fired with fossil fuels (see definition of steam generating unit).	40 CFR 60.40c(a)
Coke Battery 1 & 2 HRSG Bypass Stacks COK-105, through COK-109, COK-205, through COK-209 (RLP001-005, RLP007-011)	40 CFR 63 Subpart CCCCC - National Emission Standards For Hazardous Air Pollutants For Coke Ovens: Pushing, Quenching and Battery Stacks	Does Not Apply	Applies to opacity emissions from battery stacks at byproduct recovery coke ovens. The coke ovens are of the non-recovery oven design, and therefore these limitations do not apply to the bypass stacks	40 CFR 63.7296
	LAC 33:III, Chapter 51		LAC 33:III.5105.B.3.b exempts emissions from the combustion of Group 2 virgin fossil fuels vented from a stack that has downwash minimization stack height.	

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Coke Battery 1 & 2 HRSG Bypass	LAC 33:III.1311.B	Exempt	Where the administrative authority finds that by reason of exceptional circumstances strict conformity with any provisions of these regulations would cause undue hardship, would be unreasonable, impractical or not feasible under the circumstances, the administrative authority may permit a variance from these regulations. The BACT Analysis provided justification to grant this variance.	LAC 33:III.1311.G
Pulverized Coal Injection Mill Hot Gas Generator and Baghouse Vent PCI-101 (RLP013)	LAC 33:III.1313 - Emissions from Fuel Burning Equipment	Exempt		LAC 33:III.1313.B

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
	LAC 33:III.2115 - Waste Gas Disposal	Does Not Apply	Applies to emissions to the atmosphere of waste gas streams containing VOC. Process gas streams that are used as primary fuels are excluded from the definition of a waste gas stream.	LAC 33:III.2115.M
	Subpart Db— Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Does Not Apply	Applies to steam generating unit that has a maximum design heat input capacity between 100 and 250 MMbtu/hr. The boilers will not meet this definition.	40 CFR 60.40(a)
Topgas Boilers PWR-101, through PWR-108 (EQT023-030)	40 CFR 60 Subpart Da - Standards Of Performance For Electric Utility Steam Generating Units For Which Construction Is Commenced After September 18, 1978	Does Not Apply	Applies to each electric utility steam generating unit: (1) That is capable of combusting more than 250 MMbtu/hr heat input of fossil fuel; and (2) For which construction, modification, or reconstruction is commenced after September 18, 1978. The boilers will not meet this definition.	40 CFR 60.40(a)
Topgas Boilers PWR-101, through PWR-108 (EQT023-030)	40 CFR 60 Subpart Dc - Standards Of Performance For Small Industrial-Commercial-Institutional Steam Generating Units	Does Not Apply	Applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMbtu/hr or less, but greater than or equal to 10 MMbtu/hr. The TopGas Boilers will not be supplementally fired with fossil fuels (see definition of steam generating unit).	40 CFR 60.40c(a)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
LAC 33:III.2115 - Waste Gas Disposal	Does Not Apply	Applies to emissions to the atmosphere of waste gas streams containing VOC. Process gas streams that are used as primary fuels are excluded from the definition of a waste gas stream.		LAC 33:III.2115.M
40 CFR 60 Subpart D - Standards Of Performance For Fossil-Fuel Fired Steam Generators For Which Construction Is Commenced After August 17, 1971	Does Not Apply	Applies to fossil fuel fired and wood residue fired steam generators constructed or modified after August 17, 1971. The blast furnace stoves will not be used to generate steam.		40 CFR 60.40(a)
Hot Blast Stoves Common Stacks STV-101, STV-201 (RLP015-016)	Does Not Apply	Applies to each electric utility steam generating unit: (1) That is capable of combusting more than 250 MMBtu/hr heat input of fossil fuel; and (2) For which construction, modification, or reconstruction is commenced after September 18, 1978. The blast furnace stoves will not be used to generate steam.		40 CFR 60.40(a)
Hot Blast Stoves Common Stks STV-101, STV-201 (RLP015-016)	Does Not Apply	Applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 MMBtu/hr. The blast furnace stoves will not be used to generate steam.		40 CFR 60.40(b)(a)

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Hot Blast Stoves Common Stacks STRV-101, STRV-201 (RLP015-016)	40 CFR 60 Subpart Dc - Standards Of Performance For Small Industrial-Commercial-Institutional Steam Generating Units	Does Not Apply	Applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMbtu/hr or less, but greater than or equal to 10 MMbtu/hr. The Heat Recovery Steam Generators will not be supplementally fired with fossil fuels (see definition of steam generating unit).	40 CFR 60.40c(a)
Coal Storage Piles PIL-101 (FUG001)	40 CFR 60 Subpart Y - Standards of Performance for Coal Preparation Plants	Does Not Apply	This Subpart applies to coal storage systems. Open storage piles are explicitly excepted from the definition of a coal storage system.	40 CFR 60.251(h)
Cooling Towers TWR-101, TWR-102, TWR-103 (EQT060-062)	40 CFR 63 Subpart Q - National Emission Standards For Hazardous Air Pollutants For Industrial Process Cooling Towers	Does Not Apply	Applies to all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals and are either major sources or are integral parts of facilities that are major sources. The planned cooling towers will not be operated with chromium-based water treating chemicals.	40 CFR 63.400(a)

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Gasoline Storage Tank TNK-101 (EQT057)	40 CFR 60 Subpart Kb - New Source Performance Standards For Volatile Liquid Storage Vessels (Including Petroleum Storage Vessels) For Which Construction, Reconstruction or Modification Commenced After July 23, 1984	Does Not Apply	This Subpart applies to vessels storing volatile organic liquids with a capacity greater than 75 m³. TNK-101 will not exceed 75 m³ in size.	40 CFR 60.110b
Diesel Storage Tank TNK-102 (EQT058)	LAC 33:III.2(03 - Volatile Organic Compounds - Storage of Volatile Organic Compounds	Does Not Apply	This rule applies to storage vessels containing volatile organic liquids having a vapor pressure of 1.5 psia or greater. Diesel does not meet this vapor pressure threshold.	LAC 33:III.2(03.A

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ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Diesel Storage Tank TNK-102 (EQT058)	40 CFR 60 Subpart Kb - New Source Performance Standards For Volatile Liquid Storage Vessels (Including Petroleum Storage Vessels) For Which Construction, Reconstruction or Modification Commenced After July 23, 1984	Does Not Apply	This Subpart applies to vessels storing volatile organic liquids with a capacity greater than 75 m ³ . TNK-101 will not exceed 75 m ³ in size.	40 CFR 60.110b

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.